

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**JAMES EVERETT SHELTON**  
Plaintiff

-against-

Civil Action No. 2:18-cv-02070-NIQA

**TARGET ADVANCE, LLC**  
Defendants

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**DEFENDANT TARGET ADVANCE, LLC's SUPPLEMENTAL SUBMISSION IN  
SUPPORT OF ITS ANSWER TO PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT**

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**PRELIMINARY STATEMENT**

On October 15, 2019, Plaintiff filed his Motion for Summary Judgment against Defendant based upon Plaintiff's allegations that: 1) Plaintiff had served Requests for Admissions upon counsel for Defendant more than 30 days prior to the filing of said Motion for Summary Judgment; and 2) that Defendant had knowingly failed to answer or respond to said Requests for Admission within the 30 day window for response provided under the Federal Rules of Civil Procedure.

Defendant and Defendant's counsel aver that they were not served Plaintiff's Requests for Admission and were not aware of said Requests until the filing of Plaintiff's Motion for Summary Judgment filed with this Court on October 15, 2019. In treating October 15, 2019 as the date of service of said Requests for Admission, Defendant hereby offers its Responses to said Requests for Admission as attached herewith.

Philadelphia, PA

November 13, 2019

Respectfully submitted,

**Law Office of Norman M. Valz, P.C.**

A handwritten signature in dark ink, appearing to read 'N. Valz', is positioned above a horizontal line.

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